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UNITED STATES DISTRICT COURT  
FOR DISTRICT OF NORTHERN CALIFORNIA

VLADIMIR A. BALAREZO, individually and  
on behalf of others similarly situated

Plaintiff,  
vs.

NTH CONNECT TELECOM INC., AND  
STEVEN CHEN,

Defendants

Case No.:C07-05243 JF

**CLASS ACTION COMPLAINT AND  
DEMAND FOR JURY TRIAL:**

1). Violation of California Labor Code §1194;  
2). Violations of The Fair Labor Standards Act  
(Non-payment of overtime); 3). Violation of  
Labor Code §226.7; 4). "Waiting Time"  
Penalties under California Labor Code §203;  
and 6). For Restitution of Unpaid Wages in  
Violation of California Unfair Trade Practices  
Act under Business and Professions Code §  
17203

Plaintiff demands a trial by jury for causes of action alleged in his Complaint.

Dated: October 12, 2007

DAL BON & WANG  
ADAM WANG

By: /s/ ADAM WANG  
Attorney for Plaintiff  
Vladimir Balarezo